



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 17 2014

REPLY TO THE ATTENTION OF:

Mr. Robert W. Hare, P.E., CHMM  
Cleanup Manager (IL, IN, KS, MO, NJ, WI)  
RACER Trust  
500 Woodward Avenue Suite 1510  
Detroit, Michigan 48226

RE: Approval for Risk-Based Cleanup and Disposal of PCBs  
RACER Trust Madison Street Parcels  
222, 224, and 228 Madison Street, Bedford, Indiana

Dear Mr. Hare:

The U.S. Environmental Protection Agency has reviewed RACER Trusts' (RACER) November 18, 2014 soil excavation workplan submitted under 40 Code of Federal Regulations (CFR) §761.61(c) for risk-based cleanup and disposal of polychlorinated biphenyl (PCB) impacted fill materials at the properties known as the Madison Street Parcels (222, 224, and 228 Madison Street) located in Bedford, Indiana (Site).

The cleanup activities consist of the removal and off-site disposal of fill materials containing  $\geq 50$  milligrams per kilogram (mg/kg) PCB. RACER completed an investigation and calculated exposure point concentrations (EPCs) for PCBs found in the fill at the 228 Madison Street parcel and at the combined 222 and 224 Madison Street parcels. The post-removal EPCs at the Site will not exceed levels that would pose an unacceptable risk for a commercial/industrial property use. RACER will record deed restrictions on the Site limiting future land use to commercial/industrial, consistent with the current zoning of the area of the Site (heavy industry) and surrounding land use and restricting the use of groundwater.

This approval is granted in accordance with the federal PCB regulations codified at 40 CFR §761.61(c), under which the Regional Administrator may approve a method to dispose of PCB remediation waste if it is found that the method will not pose an unreasonable risk of injury to human health or the environment. PCB cleanup and disposal activities will be carried out in accordance with the procedures described in the November 18, 2014 work plan and with the Approval Conditions that are enclosed with this letter. This approval is based on our finding that the removal of  $\geq 50$  mg/kg PCB fill materials to meet a commercial/industrial EPC and the use of institutional controls (i.e., land use restrictions) to restrict the future use of the properties to

commercial/industrial use will not pose an unreasonable risk to human health and the environment. This approval is effective as of the date of this letter.

RACER is responsible for ensuring continued compliance with all applicable provisions of the Toxic Substances Control Act (TSCA), the federal PCB regulations, and the conditions of this approval. Any departure from the conditions of this approval or the provisions of the November 18, 2014 work plan must receive prior written authorization from this office. Further, this approval does not relieve RACER from compliance with any other federal, state, or local regulatory requirements. This approval does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties, suspension or termination of the approval for any violation, or requiring additional cleanup should RACER fail to comply with the conditions of this approval. All conditions of this approval and other applicable requirements of TSCA and its implementing regulations will continue to apply to the Site after any transfer in ownership. In addition, RACER must receive separate approval under the State PCB regulations from IDEM.

Please do not hesitate to call Peter Ramanauskas, of my staff, at (312) 886-7890 if you have any questions regarding this approval.

Sincerely,



Margaret M. Guierriero  
Director  
Land and Chemicals Division

Enclosure

cc: George Ritchotte, IDEM  
Gerald O'Callaghan, IDEM

## APPROVAL CONDITIONS

### **A. Authorized Remedial Action**

1. RACER is authorized to cleanup and dispose of PCB remediation waste at the Madison Street Parcels (222, 224, and 228 Madison Street) in Bedford, Indiana (Site) according to the procedures described in the November 18, 2014 work plan and according to the additional requirements described below:
  - a) RACER will remove all PCB impacted materials in excess of 50 mg/kg from areas identified on Figure 3 of the work plan and dispose of such material off-site in accordance with 40 CFR § 761.61(a)(5)(i)(B).
  - b) RACER will collect sidewall samples from the northern extent of the area at the boundary of "Excavation Area A" and Parcel 426 and along the eastern sidewall between at the boundary of "Excavation Area A" and Parcel 400. Samples may be composited as allowed for under 40 CFR § 761 Subpart O.
2. The receiving box or container of vehicles transporting PCB impacted material off-site must be lined along the bottom and sides. RACER will load the materials in a manner that will not damage the properly placed liner. Following loading, RACER will cover the receiving box prior to transport. Off-site transport vehicles will remain outside of contaminated areas during loading or will be decontaminated in accordance with 40 CFR § 761.79(c)(2) prior to leaving the site.
3. RACER will decontaminate movable equipment in contact with contaminated materials in accordance with 40 CFR § 761.79(c)(2). RACER will contain and manage all water generated during excavation or decontamination activities in accordance with 40 CFR § 761.79(b)(1)(ii) or (iii).

### **B. Property Use and Restrictions and Notice**

1. Within 60 days of completion of the above approved removal activities, RACER provide draft institutional control language to EPA for review.
2. RACER will record, in accordance with state law, a notation to the deeds for the properties, or in some other instrument-of-title that is normally examined during a title search, that will notify any potential purchaser of the following:
  - a) That the properties have received an approval from EPA for a risk-based PCB cleanup and disposal under TSCA which establishes commercial/industrial land use restrictions to specific areas of the

properties, and also subjects the properties to groundwater restrictions. This notation must also include legal descriptions of the properties and maps that specifically show which areas are restricted and describes their associated restrictions.

- b) That residual soils at the properties contain PCBs and will have to be remediated if the land use changes.
2. Within 10 days of recording the notice required above, RACER will submit to EPA, Region 5, a copy of the amended deed, and a certification signed by the responsible corporate officer that he/she has recorded the notation on the deed as specified above.
3. If there is a planned change in land use, RACER will provide EPA, Region 5 with at least 30 days notice prior to such a change.

**C. Change of Ownership**

1. At least 45 days before conveying, in any manner, ownership or responsibility of the properties, RACER will notify EPA, Region 5, of its intent to convey such ownership or responsibility. Such notice will include the date of the intended conveyance, and the name, address, and phone number of the intended new owner or responsible person. If the conveyance is being made to a corporate entity, this notice will also include the name of a contact person.

**D. Recordkeeping and Reporting**

1. RACER will maintain all records and documents required by 40 CFR Part 761 including records required by Subparts J and K.
2. RACER will submit a Request for Closure Report to EPA and IDEM within 90 days of completion of the activities described under this Approval. At a minimum, the report will include: a discussion of project activities, sampling analytical results, copies of the accompanying analytical chains of custody, quality control/quality assurance checks, an estimate of the quantity of PCBs removed and disposed of off-site, and copies of disposal manifests.



Peter Ramanauskas  
USEPA REGION 5  
77 West Jackson Boulevard  
Mail Code: LU-9J  
Chicago, IL 60604-3507

ARCADIS U.S., Inc.  
132 E. Washington Street  
Suite 600  
Indianapolis  
Indiana 46204  
Tel 317 231 6500  
Fax 317 231 6514  
[www.arcadis-us.com](http://www.arcadis-us.com)

Subject:  
RACER Trust-Owned Madison Street Parcels Work Plan – Soil Excavation

ENVIRONMENT

Dear Mr. Ramanauskas:

ARCADIS respectfully submits this work plan for approval to conduct excavation activities at the Revitalizing Auto Communities Environmental Response (RACER) Trust owned Parcels 427, 428, and 429 (also known as “Madison Street Parcels”) located at 228, 224, and 222 Madison Street, respectively, in Bedford, Indiana (Site) (Figure 1) under 40 CFR §761.61(c). This work plan reflects the remedial approach approved by the USEPA in an email dated November, 4, 2014.

Date:  
November 18, 2014

Contact:  
Matthew D. Griles

Phone:  
317.236.2815

#### **Previous Investigation and Exposure Point Concentration Calculation**

ARCADIS completed an investigation and calculated exposure point concentrations (EPCs) for PCBs found in the fill at the Site. This investigation was summarized in the Madison Street Parcels Further Site Investigation – Stage II Data Report (Data Report) (ARCADIS 2011). Several of the tables and figures presented in the Data Report have been reproduced for this work plan. Based on the results of the EPC study, ARCADIS recommends the excavation and removal of two intervals of fill that contain PCBs at concentrations of 50 mg/kg or greater (Figure 2). It is the intent of this proposed focused excavation to remove impacted soils to reduce and/or eliminate potential significant exposure to PCBs and sell the parcels for beneficial reuse.

Email:  
[matthew.griles@arcadis-us.com](mailto:matthew.griles@arcadis-us.com)

Our ref:  
IN000833.0013.0004

Previous subsurface investigation and characterization activities have identified PCBs in a fill layer along the parcel’s eastern property boundaries adjacent to a parcel (Parcel 400) that GM LLC is responsible for cleanup (see Tables 1.1 through 1.3 and Figure 2). This discontinuous layer of fill was historically placed on the Site and the adjacent properties. Where present at the Site, the thickness of the fill is variable, reaching a maximum observed thickness of 14 feet. Work performed during previous investigations has laterally and vertically delineated the extent of PCBs in the fill placed at the Site. PCB concentrations in the fill were found to exceed the

Imagine the result

Toxic Substances Control Act (TSCA) regulated criteria of 50 mg/kg at two soil borings: B-427-001 & B-428-002 (see Tables 1.1 through 1.3 and Figure 2). At the time of the investigation, ARCADIS used the Indiana Department of Environmental Management (IDEM) Risk Integrated System of Closure (RISC) screening criteria for general screening during the investigation (Tables 1.1 through 1.3); however, during comparison of the EPC data to screening criteria, ARCADIS also used the draft IDEM Remediation Closure Guide (RCG) screening criteria (Tables 2.1 and 2.2).

ARCADIS anticipated that all soils with a PCB concentration in excess of 50 mg/kg would be excavated and disposed off-Site; therefore, any data points that were greater than 50 mg/kg were removed from the dataset used to calculate the EPC values. The site was divided such that EPC values were derived for two separate "properties": Parcel 427 alone as one property and Parcel 428 and 429 combined as a second property. This is in line with the anticipated future use of the properties and projected boundaries of the parcels. ProUCL backup documentation is provided in Appendix A of the Data Report. The backup documentation includes the various calculated UCL statistics for comparison, including Kaplan-Meier (KM) estimates using the Student's t-distribution, KM estimates using the Chebyshev inequality, and the UCL based on KM Bias-Corrected Accelerated (BCA) Bootstrap. The EPC results for each property are discussed below and presented in Table 2.1 and Table 2.2 (previously submitted in the Data Report).

#### Parcel 427

The PCB concentration from the 2 ft to 4 ft bgs interval at the B-427-001 location on Parcel 427 (80 mg/kg) was reported above the TSCA regulated criteria 50 mg/kg and was subsequently removed from the data set prior to calculating the EPC. A summary of the EPC calculations is presented in Table 2.1. Using the remainder of the PCB soil data, the EPC (2.6 mg/kg) is well below the IDEM RISC Industrial Construction Worker Closure Level (16 mg/kg). Using just subsurface soil data, the calculated EPC (3.3 mg/kg) is also well below the IDEM RISC Industrial Construction Worker Closure Level (16 mg/kg). Using only surface soil data, the EPC (6.3 mg/kg) is slightly above the RISC Commercial/Industrial Direct Contact Closure Level (5.3 mg/kg), however, is below IDEM's proposed Commercial/Industrial Screening Level (7.4 mg/kg) in the draft RCG (2011). These calculated EPCs are below the current (2014) IDEM RCG Commercial/Industrial Screening Level (7.4 mg/kg) and Excavation Workers (18 mg/kg) for PCB Aroclors detected at the Madison Street Parcels.

#### Parcel 428/429

The PCB concentration from the 4ft to 6ft bgs interval at the B-428-002 location on Parcel 428 was reported above the TSCA regulated criteria (53.4mg/kg) and was subsequently removed from the data set prior to calculating the EPC. A summary of the EPC calculations is presented in Table 2.2. Using the remainder of all PCB soil data, the EPCs calculated using all surface and subsurface soil data (5.7 mg/kg) and the EPC calculated for just the subsurface data (4.4 mg/kg) are both below the IDEM RISC Industrial Construction Worker Closure Level (16 mg/kg). The EPC calculated using only surface soil data (2.8 mg/kg) is below the IDEM RISC Commercial/Industrial Direct Contact Closure Level (5.3 mg/kg). These calculated EPCs are below the current (2014) IDEM RCG Commercial/Industrial Screening Level (7.4) and Excavation Workers (18 mg/kg) for PCB Aroclors detected at the Madison Street Parcels.

## Work Plan

### 1. Pre-Excavation Activities

Prior to excavation, ARCADIS will clear underground utilities by calling Indiana Underground Plan Protection Services (IUPPS) and solicit a private locating service to clear the dig areas. It may be required to have the weeds mowed prior to utility locating and/or excavation, to ensure a safe working environment. The Health and Safety Plan (HASP) will be updated, as necessary.

### 2. Excavation Activities

A subcontractor will excavate the impacted soils at specific depth intervals from within the two excavation areas (Area A and Area B) as indicated on Figure 3. The boundaries of the excavation are either property boundaries to the north and east, or lines that extend to each of the next nearest soil borings which did not exhibit concentrations above 50 ppm. Soils with PCB impacts less than 50 ppm will be stockpiled on-Site and be used as backfill material once all excavation activities are completed.

In order to vertically isolate the RACER Trust owned Madison St Parcels soil from the adjacent GM owned Parcel 400 soils as well as to satisfy OSHA's Excavation Standard, a trench box or comparable shoring system will be installed on the eastern property boundary in Areas A and B. Field observations will be recorded in a log book and maintained in the field. The extents of the excavations and soil sample locations will be recorded using a hand held Global Positioning System (GPS) unit.

At USEPA's request, ARCADIS will collect sidewall samples from the northern extent of the excavation, along the boundary of "Excavation Area A" and Parcel 426 in accordance with 40 CFR 761, Subpart O. Notably, ARCADIS will lay out a grid on the northern sidewall with two horizontal lines and three vertical lines evenly spaced along the sidewall. A sample will be collected at each of the six grid nodes (intersection points). These six samples will be submitted to Pace Analytical in Indianapolis, Indiana, composited into one sample and analyzed for polychlorinated biphenyls (PCB) via USEPA SW-846 Method 8082. Additionally, per USEPA's request ARCADIS will collect one sample on the eastern sidewall between "Excavation Area A" and Parcel 400, at the mid-point of the excavation depth.

Once the extents of the excavation have been reached, the areas will be backfilled with the stockpiled soil from the upper portion of the excavation and/or a suitable fill material, and the shoring system will be removed. RACER Trust may request to use excess soil from Parcel 39 for backfill.

ARCADIS will use the existing soil data for waste characterization purposes for the transportation and disposal of soils with PCB impacts greater than 50 ppm. All soil media will be disposed off-site at an appropriately licensed facility.

#### **Data Evaluation and Reporting**

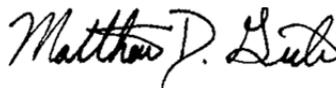
ARCADIS will summarize the excavation and sampling activities in a Request for Closure report. If you have any questions or comments, please contact the undersigned or Robert Hare at your convenience.

Sincerely,

ARCADIS U.S., Inc.



Sarah Fisher  
Senior Scientist



Matthew Griles, LPG  
Project Geologist

Attachments:

Table 1.1 – Comparison of Surface Soil Data to Residential and Industrial Direct Contact Screening Levels

Table 1.2 - Comparison of Soil Column Analytical Data to Construction Worker Screening Levels

Table 1.3 - Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Table 2.1 - Occurrence of PCBs in Soil, Madison Street Parcel 427

Table 2.2 - Occurrence of PCBs in Soil, Madison Street Parcels 428 and 429

Figure 1 – Site Map

Figure 2 - Summary of PCBs Detected in Soil

Figure 3 - Proposed Excavation Extents

Copies:

Mario Mangino, USEPA

Gerald O'Callaghan, IDEM

George Ritchotte, IDEM

Robert Hare, RACER Trust

Cheryl Hiatt, GM LLC

Table 1.1 Comparison of Surface Soil Data to Residential and Industrial Direct Contact Screening Levels

Constituents (mg/kg)			Parcel		IDEM Screening Levels		Data Summary						Comparison to Screening Levels				427	427	427
			Location ID		Residential Soil Direct Contact	Industrial Soil Direct Contact	Detection Frequency	Minimum Non-Detect	Maximum Non-Detect	Minimum Detect	Arithmetic Average	Maximum Detect	Residential Screening Level	Does Max Exceed Screening Level?	Industrial Screening Level	Does Max Exceed Screening Level?	B-X010Y247	B-427-001	B-427-002
			Sample ID														S-012109-DD-1592	S-092910-RW-001(0-2)	S-092910-RW-002(0-2)
			Sample Date																
			Depth Range																
			Depth Interval																
PCBs (polychlorinated biphenyls)			CAS No	Unit															
Aroclor-1016 (PCB-1016)			12674-11-2	mg/kg	1.8 C	5.3 C	0/31	0.034	3.9	ND	0.284	ND	1.8	No/ND	5.3	No/ND	< 0.4	< 2.1	< 3.6
Aroclor-1221 (PCB-1221)			11104-28-2	mg/kg	1.8 C	5.3 C	0/31	0.034	3.9	ND	0.284	ND	1.8	No/ND	5.3	No/ND	< 0.4	< 2.1	< 3.6
Aroclor-1232 (PCB-1232)			11141-16-5	mg/kg	1.8 C	5.3 C	0/31	0.034	3.9	ND	0.284	ND	1.8	No/ND	5.3	No/ND	< 0.4	< 2.1	< 3.6
Aroclor-1242 (PCB-1242)			53469-21-9	mg/kg	1.8 C	5.3 C	0/31	0.034	3.9	ND	0.283	ND	1.8	No/ND	5.3	No/ND	< 0.4	< 2.1	< 3.6
Aroclor-1248 (PCB-1248)			12672-29-6	mg/kg	1.8 C	5.3 C	21/31	0.034	0.042	0.72	2.14	12	1.8	Yes	5.3	Yes	1.3	<b>3.2</b>	<b>12</b>
Aroclor-1254 (PCB-1254)			11097-69-1	mg/kg	1.8 C	5.3 C	1/31	0.034	3.9	0.022	0.284	0.022	1.8	No	5.3	No	< 0.4	< 2.1	< 3.6
Aroclor-1260 (PCB-1260)			11096-82-5	mg/kg	1.8 C	5.3 C	17/31	0.034	3.9	0.14	0.573	4	1.8	Yes	5.3	No	0.43	< 2.1	<b>4</b>
Total PCBs			1336-36-3	mg/kg	1.8 C	5.3 C	22/31	0.034	0.042	0.022	2.59	16	1.8	Yes	5.3	Yes	1.73	<b>3.2</b>	<b>16</b>

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Soil Direct Criteria**

**Shade and Bold exceedances of the Industrial Direct Contact Criteria**

C - Screening Level is based on a cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Table 1.1 Comparison of Surface Soil Data to Residential and Industrial Direct Contact Screening Levels

Constituents (mg/kg)			Parcel		IDEM Screening Levels		427	427	427	427	427	427	427	427	427	427	427	
Location ID			Residential Soil Direct Contact		Industrial Soil Direct Contact		B-427-003 S-092910- RW-010(0- 2)	B-427-004 S-092910- RW-011(0- 2)	B-427-005 S-092910- RW-012(0- 2)	B-427-006 S-093010- RW-013(0- 2)	B-427-007 S-093010- RW-014(0- 2)	B-427-008 S-092910- RW-009(0- 2)	B-427-009 S-092910- RW-003(0- 2)	B-427-010 S-022411- WK-046	B-427-011 S-022411- WK-052	B-427-012 S-022311- WK-007	B-427-013 S-022311- WK-023	B-427-014 S-022311- WK-001
Sample ID			Sample Date		Depth Range		Depth Interval											
PCBs (polychlorinated biphenyls)			CAS No	Unit														
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	< 3.9	< 0.21	< 0.41	< 0.81	< 0.76	< 0.22
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	< 3.9	< 0.21	< 0.41	< 0.81	< 0.76	< 0.22
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	< 3.9	< 0.21	< 0.41	< 0.81	< 0.76	< 0.22
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	< 3.9	< 0.21	< 0.41	< 0.81	< 0.76	< 0.22
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	<b>4.2</b>	<b>2.1 J</b>	<b>3</b>	<b>6.9</b>	<b>12</b>	1.2
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	< 3.9	< 0.21	< 0.41	< 0.81	< 0.76	< 0.22
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	< 3.9	0.62 J	0.71	1.6	<b>2.2</b>	0.27
Total PCBs	1336-36-3	mg/kg	1.8	C	5.3	C	< 0.039	< 0.037	< 0.039	< 0.037	< 0.037	< 0.042	<b>4.2</b>	<b>2.72</b>	<b>3.71</b>	<b>8.5</b>	<b>14.2</b>	1.47

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Soil Direct Criteria**

**Shade and Bold exceedances of the Industrial Direct Contact Criteria**

C - Screening Level is based on a cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Table 1.1 Comparison of Surface Soil Data to Residential and Industrial Direct Contact Screening Levels

Constituents (mg/kg)			Parcel		IDEM Screening Levels		427	427	428	428	428	428	428	429	429	429	429	429
			Location ID				B-427-015	B-427-016	B-428-002	B-428-003	B-428-005	B-428-006	B-428-007	B-X010Y242	B-429-001	B-429-002	B-429-003	B-429-004
			Sample ID	Residential Soil Direct Contact	Industrial Soil Direct Contact		S-022411-WK-055	S-022311-WK-010	S-092910-RW-004(0-2)	S-092910-RW-007(0-2)	S-093010-RW-015(0-2)	S-022411-WK-039	S-022311-WK-016	S-012109-DD-1589	S-092910-RW-005(0-2)	S-092910-RW-006(0-2)	S-092910-RW-008(0-2)	S-093010-RW-016(0-2)
			Sample Date				2/24/2011	2/23/2011	9/29/2010	9/29/2010	9/30/2010	2/24/2011	2/23/2011	1/21/2009	9/29/2010	9/29/2010	9/29/2010	9/30/2010
			Depth Range				0-0.5	0-0.5	0-2	0-2	0-2	0-0.5	0-0.5	0-2	0-2	0-2	0-2	0-2
			Depth Interval				Surface	Surface	Surface	Surface	Surface	Surface	Surface	Surface	Surface	Surface	Surface	Surface
PCBs (polychlorinated biphenyls)	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	1.8	C	5.3	C	< 0.83	< 0.2	< 0.75 J	< 0.4	< 0.038	< 0.21	< 0.22	< 0.76	< 0.34	< 0.36 J	< 0.034	< 0.037
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	1.8	C	5.3	C	< 0.83	< 0.2	< 0.75 J	< 0.4	< 0.038	< 0.21	< 0.22	< 0.76	< 0.34	< 0.36 J	< 0.034	< 0.037
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	1.8	C	5.3	C	< 0.83	< 0.2	< 0.75 J	< 0.4	< 0.038	< 0.21	< 0.22	< 0.76	< 0.34	< 0.36 J	< 0.034	< 0.037
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	1.8	C	5.3	C	< 0.83	< 0.2	< 0.75 J	< 0.4	< 0.038	< 0.21	< 0.22	< 0.76	< 0.34	< 0.36 J	< 0.034	< 0.037
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	1.8	C	5.3	C	<b>4.3</b>	0.96	1.6 J	1.2	< 0.038	0.72	1.1	<b>3.9</b>	1.8	1 J	< 0.034	< 0.037
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	1.8	C	5.3	C	< 0.83	< 0.2	< 0.75 J	< 0.4	< 0.038	< 0.21	< 0.22	< 0.76	< 0.34	< 0.36 J	< 0.034	< 0.037
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	1.8	C	5.3	C	0.84	0.22	0.52 J	< 0.4	< 0.038	0.18 J	0.25	1.1	< 0.34	0.32 J	< 0.034	< 0.037
Total PCBs	1336-36-3	mg/kg	1.8	C	5.3	C	<b>5.14</b>	1.18	<b>2.12</b>	1.2	< 0.038	0.9	1.35	<b>5</b>	1.8	1.32	< 0.034	< 0.037

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Soil Direct Criteria**

**Shade and Bold exceedances of the Industrial Direct Contact Criteria**

C - Screening Level is based on a cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel		IDEM Screening Levels		Data Summary						Comparison to Screening Levels		427	427	427
			Location ID												B-X010Y247	B-X010Y247	B-X010Y247
			Sample ID		Construction Worker		Detection	Minimum	Maximum	Minimum	Arithmetic	Maximum	Construction	Does Max	S-012109-DD-	S-012109-DD-	S-012109-DD-
			Sample Date				Frequency	Non-Detect	Non-Detect	Detect	Average	Detect	Worker	Exceed	1592	1593	1594
			Depth Range										Screening Level	Screening Level?	0-2	6-8	6-8
			Depth Interval												Surface	Subsurface	Subsurface
PCBs (polychlorinated biphenyls)			CAS No	Unit													
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	0/153	0.024	7.7	ND	0.22	ND	16	No/ND	< 0.4	< 0.04	< 0.043		
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	0/153	0.018	7.7	ND	0.22	ND	16	No/ND	< 0.4	< 0.04	< 0.043		
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	0/153	0.016	7.7	ND	0.22	ND	16	No/ND	< 0.4	< 0.04	< 0.043		
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	14/153	0.015	7.7	0.028	0.643	48	16	<b>Yes</b>	< 0.4	< 0.04	< 0.043		
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	75/153	0.034	3.6	0.021	2.26	67	16	<b>Yes</b>	1.3	< 0.04	< 0.043		
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	3/153	0.02	7.7	0.022	0.225	0.96	16	No	< 0.4	< 0.04	< 0.043		
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	60/153	0.02	7.7	0.021	0.455	13	16	No	0.43	< 0.04	< 0.043		
Total PCBs	1336-36-3	mg/kg	16	NC	91/153	0.034	0.049	0.021	3.05	80	16	<b>Yes</b>	1.73	< 0.04	< 0.043		

Notes:

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	427	427	427	427	427	427	427	427	
			Location ID	Construction Worker	B-427-001	B-427-001	B-427-001	B-427-001	B-427-002	B-427-002	B-427-002	B-427-002	
			Sample ID		S-092910-RW-001(0-2)	S-092910-RW-001(2-4)	S-092910-RW-001(4-6)	DUP-092910-RW-001FD	S-092910-RW-002(0-2)	S-092910-RW-002(2-4)	S-092910-RW-002(4-6)	S-092910-RW-002(6-8)	DUP-092910-RW-002FD
			Sample Date		9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010
			Depth Range		0-2	2-4	4-6	4-6	0-2	2-4	4-6	6-8	6-8
			Depth Interval		Surface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface
PCBs (polychlorinated biphenyls)	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 2.1	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 2.1	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 2.1	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 2.1	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	3.2	<b>67</b>	0.37	0.69	12	4.5	0.1	< 0.042	< 0.041
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 2.1	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	< 2.1	13	< 0.21	0.13 J	4	< 0.76	0.024 J	< 0.042	< 0.041
Total PCBs	1336-36-3	mg/kg	16	NC	3.2	<b>80</b>	0.37	0.82	16	4.5	0.124	< 0.042	< 0.041

Notes:

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	427	427	427	427	427	427	427	427	
			Location ID		B-427-003	B-427-003	B-427-003	B-427-003	B-427-003	B-427-004	B-427-004	B-427-004	
			Sample ID	Construction Worker	S-092910-RW-010(0-2)	S-092910-RW-010(2-4)	S-092910-RW-010(4-6)	S-092910-RW-010(6-8)	S-092910-RW-010(8-10)	S-092910-RW-011(0-2)	S-092910-RW-011(2-4)	S-092910-RW-011(4-6)	
			Sample Date		9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010
			Depth Range		0-2	2-4	4-6	6-8	8-10	0-2	2-4	4-6	6-8
			Depth Interval		Surface	Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface
PCBs (polychlorinated biphenyls)			CAS No	Unit									
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044
Total PCBs	1336-36-3	mg/kg	16	NC	< 0.039	< 0.042	< 0.041	< 0.039	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)	Parcel		IDEM Screening Levels		427	427	427	427	427	427	427	427
	Location ID				B-427-005	B-427-005	B-427-005	B-427-005	B-427-005	B-427-006	B-427-006	B-427-006
	Sample ID		Construction Worker		S-092910-RW-012(0-2)	S-092910-RW-012(2-4)	S-092910-RW-012(4-6)	S-092910-RW-012(6-8)	S-092910-RW-012(8-10)	S-093010-RW-013(0-2)	S-093010-RW-013(2-4)	S-093010-RW-013(4-6)
	Sample Date				9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/30/2010	9/30/2010	9/30/2010
	Depth Range				0-2	2-4	4-6	6-8	8-10	0-2	2-4	4-6
Depth Interval				Surface	Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	
PCBs (polychlorinated biphenyls)	CAS No	Unit										
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04
Total PCBs	1336-36-3	mg/kg	16	NC	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038	< 0.04

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	427	427	427	427	427	427	427	427	
			Location ID		B-427-006	B-427-007	B-427-007	B-427-007	B-427-008	B-427-008	B-427-008	B-427-009	
			Sample ID	Construction Worker	S-093010-RW-013(8-10)	S-093010-RW-014(0-2)	S-093010-RW-014(2-4)	S-093010-RW-014(4-6)	S-092910-RW-009(0-2)	S-092910-RW-009(2-4)	S-092910-RW-009(4-6)	S-092910-RW-009(6-8)	
			Sample Date		9/30/2010	9/30/2010	9/30/2010	9/30/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010
			Depth Range		8-10	0-2	2-4	4-6	0-2	2-4	4-6	6-8	0-2
			Depth Interval		Subsurface	Surface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Surface
PCBs (polychlorinated biphenyls)	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	4.2
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9
Total PCBs	1336-36-3	mg/kg	16	NC	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	4.2

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)	Parcel		IDEM Screening Levels		427	427	427	427	427	427	427	427	427											
	Location ID	Sample ID	Construction Worker	S-092910-RW-003(2-4)	DUP-092910-RW-003FD	S-092910-RW-003(4-6)	S-092910-RW-003(6-8)	S-022411-WK-046	S-022411-WK-047	S-022411-WK-048	DUP-022411-WK-051	S-022411-WK-049	S-022411-WK-050											
														Sample Date	9/29/2010	9/29/2010	9/29/2010	9/29/2010	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011
														Depth Range	2-4	2-4	4-6	6-8	0-0.5	0.5-2	2-4	2-4	4-6	6-8
Depth Interval	Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface													
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit																						
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.038	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04										
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.038	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04										
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.038	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04										
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.038	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	1.2	0.76	< 0.042	< 0.04										
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	0.096	0.16	0.23	0.021 J	2.1 J	0.25	< 0.41	< 0.2	0.028 J	< 0.04										
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.038	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04										
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	0.022 J	0.034 J	0.03 J	< 0.041	0.62 J	0.036 J	< 0.41	< 0.2	< 0.042	< 0.04										
Total PCBs	1336-36-3	mg/kg	16	NC	0.118	0.194	0.26	0.021	2.72	0.286	1.2	0.76	0.028	< 0.04										

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	427	427	427	427	427	427	427	427	
			Location ID		B-427-011	B-427-011	B-427-011	B-427-012	B-427-012	B-427-012	B-427-013	B-427-013	
			Sample ID	Construction Worker	S-022411-WK-052	S-022411-WK-053	S-022411-WK-054	S-022311-WK-007	S-022311-WK-008	S-022311-WK-009	S-022311-WK-023	S-022311-WK-024	
			Sample Date		2/24/2011	2/24/2011	2/24/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011
			Depth Range		0-0.5	0.5-2	2-4	0-0.5	0.5-2	2-4	0-0.5	0.5-2	2-4
			Depth Interval		Surface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Surface	Subsurface	Subsurface
PCBs (polychlorinated biphenyls)	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16 NC	< 0.41	< 0.4	< 0.04	< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16 NC	< 0.41	< 0.4	< 0.04	< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16 NC	< 0.41	< 0.4	< 0.04	< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16 NC	< 0.41	< 0.4	< 0.04	< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16 NC	3	0.95	0.15	6.9	6.9	0.36	12	<b>17 J</b>	0.77	
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16 NC	< 0.41	< 0.4	< 0.04	< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16 NC	0.71	0.22 J	0.024 J	1.6	1.4	0.048	2.2	3 J	0.11 J	
Total PCBs	1336-36-3	mg/kg	16 NC	3.71	1.17	0.174	8.5	8.3	0.408	14.2	<b>20</b>	0.88	

Notes:

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	427	427	427	427	427	427	427	427	
			Location ID		B-427-014	B-427-014	B-427-014	B-427-014	B-427-015	B-427-015	B-427-015	B-427-015	
			Sample ID	Construction Worker	S-022311-WK-001	S-022311-WK-002	S-022311-WK-003	DUP-022311-WK-005	S-022411-WK-055	S-022411-WK-056	S-022411-WK-057	S-022411-WK-058	
			Sample Date		2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/23/2011
			Depth Range		0-0.5	0.5-2	2-4	2-4	0-0.5	0.5-2	2-4	4-6	0-0.5
			Depth Interval		Surface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	
PCBs (polychlorinated biphenyls)	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	< 0.8	< 0.043	< 0.042	< 0.2
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	< 0.8	< 0.043	< 0.042	< 0.2
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	< 0.8	< 0.043	< 0.042	< 0.2
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	< 0.8	< 0.043	< 0.042	< 0.2
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	1.2	3.6	0.29 J	0.093 J	4.3	7.6	0.095	< 0.042	0.96
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	< 0.8	< 0.043	< 0.042	< 0.2
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	0.27	0.48 J	0.044	< 0.045	0.84	1.8	< 0.043	< 0.042	0.22
Total PCBs	1336-36-3	mg/kg	16	NC	1.47	4.08	0.334	0.093	5.14	9.4	0.095	< 0.042	1.18

Notes:

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)	Parcel		IDEM Screening Levels		427	427	427	427	428	428	428	428	428
	Location ID	Sample ID	Construction Worker		B-427-016	B-427-016	B-427-016	B-427-016	B-428-002	B-428-002	B-428-002	B-428-002	B-428-002
	Sample Date	Sample Date			S-022311-WK-011	DUP-022311-WK-014	S-022311-WK-012	S-022311-WK-013	S-092910-RW-004(0-2)	S-092910-RW-004(2-4)	DUP-092910-RW-004FD	S-092910-RW-004(4-6)	S-092910-RW-004(6-8)
	Depth Range	Depth Range			2/23/2011	2/23/2011	2/23/2011	2/23/2011	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010
	Depth Interval	Depth Interval			0.5-2	0.5-2	2-4	4-6	0-2	2-4	2-4	4-6	6-8
					Subsurface	Surface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041	< 3.6	< 0.19
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041	< 3.6	< 0.19
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041	< 3.6	< 0.19
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041	<b>48</b>	1.3
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	0.31 J	1 J	< 0.042	0.041 J	1.6 J	0.24	0.15	< 3.6	< 0.19
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041	< 3.6	0.18 J
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	0.066	< 0.2	< 0.042	< 0.042	0.52 J	0.042	< 0.041	5.4	< 0.19
Total PCBs	1336-36-3	mg/kg	16	NC	0.376	1	< 0.042	0.041	2.12	0.282	0.15	<b>53.4</b>	1.48

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	428	428	428	428	428	428	428	428	
			Location ID		B-428-002	B-428-002	B-428-002	B-428-002	B-428-003	B-428-003	B-428-003	B-428-005	
			Sample ID	Construction Worker	S-092910-RW-004(8-10)	S-092910-RW-004(10-12)	S-092910-RW-004(12-14)	S-092910-RW-004(14-16)	S-092910-RW-007(0-2)	S-092910-RW-007(2-4)	S-092910-RW-007(4-6)	S-093010-RW-015(0-2)	
			Sample Date		9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/30/2010
			Depth Range		8-10	10-12	12-14	14-16	0-2	2-4	4-6	6-8	0-2
			Depth Interval		Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Surface
PCBs (polychlorinated biphenyls)	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.043	0.11	0.056	0.073	< 0.4	0.3	< 0.039	< 0.041	< 0.038
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	< 0.043	< 0.043	< 0.04	< 0.039	1.2	< 0.2	< 0.039	< 0.041	< 0.038
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038
Total PCBs	1336-36-3	mg/kg	16	NC	< 0.043	0.11	0.056	0.073	1.2	0.3	< 0.039	< 0.041	< 0.038

Notes:

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	428	428	428	428	428	428	428	428	
			Location ID		B-428-005	B-428-005	B-428-005	B-428-006	B-428-006	B-428-006	B-428-006	B-428-006	
			Sample ID	Construction Worker	S-093010-RW-015(2-4)	S-093010-RW-015(4-6)	S-093010-RW-015(6-8)	S-022411-WK-039	S-022411-WK-040	DUP-022411-WK-045	S-022411-WK-041	S-022411-WK-042	
			Sample Date		9/30/2010	9/30/2010	9/30/2010	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011
			Depth Range		2-4	4-6	6-8	0-0.5	0.5-2	0.5-2	2-4	4-6	6-8
			Depth Interval		Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface
PCBs (polychlorinated biphenyls)	CAS No	Unit											
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	0.72	0.14 J	0.31 J	<b>23 J</b>	<b>39 J</b>	<b>18 J</b>
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	0.18 J	0.021 J	0.052	2.6 J	< 7.7 J	< 4.1 J
Total PCBs	1336-36-3	mg/kg	16	NC	< 0.041	< 0.038	< 0.04	0.9	0.161	0.362	<b>25.6</b>	<b>39</b>	<b>18</b>

Notes:

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.2 Comparison of Soil Column Analytical Data to Construction Worker Screening Levels.

Constituents (mg/kg)			Parcel	IDEM Screening Levels	428	428	428	428	428	428	428	429	429	
			Location ID		B-428-006	B-428-007	B-428-007	B-428-007	B-428-007	B-428-007	B-428-007	B-X010Y242	B-X010Y242	
			Sample ID	Construction Worker	S-022411-WK-044	S-022311-WK-016	S-022311-WK-017	DUP-022311-WK-021	S-022311-WK-018	S-022311-WK-019	S-022311-WK-020	S-012109-DD-1589	S-012109-DD-1590	
			Sample Date		2/24/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	1/21/2009	1/21/2009
			Depth Range		8-10	0-0.5	0.5-2	0.5-2	2-4	4-6	4-6	6-8	0-2	6-8
			Depth Interval		Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface
PCBs (polychlorinated biphenyls)	CAS No	Unit												
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	16	NC	< 0.043	< 0.22	< 0.41	< 0.2	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	16	NC	< 0.043	< 0.22	< 0.41	< 0.2	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	16	NC	< 0.043	< 0.22	< 0.41	< 0.2	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	16	NC	0.5	< 0.22	< 0.41	< 0.2	11 J	2.9	0.054	< 0.76	< 0.83	
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	16	NC	< 0.043	1.1	2.1	2	< 2 J	< 0.4	< 0.041	3.9	6.9	
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	16	NC	< 0.043	< 0.22	< 0.41	< 0.2	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	16	NC	0.031 J	0.25	0.26 J	0.21	1.8 J	0.65	< 0.041	1.1	1.5	
Total PCBs	1336-36-3	mg/kg	16	NC	0.531	1.35	2.36	2.21	12.8	3.55	0.054	5	8.4	

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Shade and Bold exceedances of the Construction Worker Criteria**

NC - Screening Level is based on a non-cancer endpoint

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)			IDEM Screening Levels				Data Summary						Comparison to Screening Levels				427	427	427	427
Parcel Location ID			Residential Soil Migration to Groundwater		Industrial Soil Migration to Groundwater		Detection Frequency	Minimum Non-Detect	Maximum Non-Detect	Minimum Detect	Arithmetic Average	Maximum Detect	Residential Screening Level	Does Max Exceed Screening Level?	Industrial Screening Level	Does Max Exceed Screening Level?	B-X010Y247	B-X010Y247	B-X010Y247	B-427-001
Sample ID	Sample Date	Depth Range															Depth Interval	S-012109-DD-1592	S-012109-DD-1593	S-012109-DD-1594
PCBs (polychlorinated biphenyls)	CAS No	Unit																		
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2	MCL	18	C	0/153	0.024	7.7	ND	0.22	ND	6.2	No/ND	18	No/ND	< 0.4	< 0.04	< 0.043	< 2.1
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2	MCL	18	C	0/153	0.018	7.7	ND	0.22	ND	6.2	No/ND	18	No/ND	< 0.4	< 0.04	< 0.043	< 2.1
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2	MCL	18	C	0/153	0.016	7.7	ND	0.22	ND	6.2	No/ND	18	No/ND	< 0.4	< 0.04	< 0.043	< 2.1
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2	MCL	18	C	14/153	0.015	7.7	0.028	0.643	48	6.2	Yes	18	Yes	< 0.4	< 0.04	< 0.043	< 2.1
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2	MCL	18	C	75/153	0.034	3.6	0.021	2.26	67	6.2	Yes	18	Yes	1.3	< 0.04	< 0.043	3.2
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2	MCL	18	C	3/153	0.02	7.7	0.022	0.225	0.96	6.2	No	18	No	< 0.4	< 0.04	< 0.043	< 2.1
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2	MCL	18	C	60/153	0.02	7.7	0.021	0.455	13	6.2	Yes	18	No	0.43	< 0.04	< 0.043	< 2.1
Total PCBs	1336-36-3	mg/kg	6.2	MCL	18	C	91/153	0.034	0.049	0.021	3.05	80	6.2	Yes	18	Yes	1.73	< 0.04	< 0.043	3.2

Notes:

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)			Parcel		IDEM Screening Levels		427		427		427		427		427		427	
			Location ID				B-427-001	B-427-001	B-427-001	B-427-002	B-427-002	B-427-002	B-427-002	B-427-002	B-427-003	B-427-003	B-427-003	B-427-003
			Sample ID		Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater	S-092910-RW-001(2-4)	S-092910-RW-001(4-6)	DUP-092910-RW-001FD	S-092910-RW-002(0-2)	S-092910-RW-002(2-4)	S-092910-RW-002(4-6)	S-092910-RW-002(6-8)	DUP-092910-RW-002FD	S-092910-RW-010(0-2)	S-092910-RW-010(2-4)	S-092910-RW-010(4-6)	S-092910-RW-010(6-8)
			Sample Date				9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010
			Depth Range				2-4	4-6	4-6	0-2	2-4	4-6	6-8	6-8	0-2	2-4	4-6	6-8
			Depth Interval				Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface
PCBs (polychlorinated biphenyls)	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2	MCL	18	C	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2	MCL	18	C	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2	MCL	18	C	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2	MCL	18	C	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2	MCL	18	C	<b>67</b>	0.37	0.69	<b>12</b>	4.5	0.1	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2	MCL	18	C	< 3.8	< 0.21	< 0.21	< 3.6	< 0.76	< 0.043	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2	MCL	18	C	<b>13</b>	< 0.21	0.13 J	4	< 0.76	0.024 J	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039
Total PCBs	1336-36-3	mg/kg	6.2	MCL	18	C	<b>80</b>	0.37	0.82	<b>16</b>	4.5	0.124	< 0.042	< 0.041	< 0.039	< 0.042	< 0.041	< 0.039

Notes:

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels		427		427		427		427		427		427		427	
	Location ID	Sample ID	Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater	B-427-003	B-427-004	B-427-004	B-427-004	B-427-004	B-427-005	B-427-005	B-427-005	B-427-005	B-427-005	B-427-006	B-427-006		
					S-092910-RW-010(8-10)	S-092910-RW-011(0-2)	S-092910-RW-011(2-4)	S-092910-RW-011(4-6)	S-092910-RW-011(6-8)	S-092910-RW-012(0-2)	S-092910-RW-012(2-4)	S-092910-RW-012(4-6)	S-092910-RW-012(6-8)	S-092910-RW-012(8-10)	S-093010-RW-013(0-2)	S-093010-RW-013(2-4)		
					Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date		
Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range			
Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval	Depth Interval		
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		
Total PCBs	1336-36-3	mg/kg	6.2 MCL	18 C	< 0.042	< 0.037	< 0.037	< 0.043	< 0.044	< 0.039	< 0.042	< 0.04	< 0.049	< 0.039	< 0.037	< 0.038		

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels				427	427	427	427	427	427	427	427	427	427	427	
	Location ID				427	427	427	427	427	427	427	427	427	427	427	427	427	
	Sample ID		Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater	S-093010-RW-013(4-6)	S-093010-RW-013(6-8)	S-093010-RW-013(8-10)	S-093010-RW-014(0-2)	S-093010-RW-014(2-4)	S-093010-RW-014(4-6)	S-092910-RW-009(0-2)	S-092910-RW-009(2-4)	S-092910-RW-009(4-6)	S-092910-RW-009(6-8)	S-092910-RW-003(0-2)	S-092910-RW-003(2-4)		
	Sample Date				9/30/2010	9/30/2010	9/30/2010	9/30/2010	9/30/2010	9/30/2010	9/30/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010
Depth Range				4-6	6-8	8-10	0-2	2-4	4-6	0-2	2-4	4-6	6-8	0-2	2-4			
Depth Interval				Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Surface	Subsurface			
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9	< 0.038
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9	< 0.038
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9	< 0.038
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9	< 0.038
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	4.2	0.096
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9	< 0.038
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	< 3.9	0.022 J
Total PCBs	1336-36-3	mg/kg	6.2	MCL	18	C	< 0.04	< 0.042	< 0.043	< 0.037	< 0.041	< 0.041	< 0.042	< 0.04	< 0.045	< 0.042	4.2	0.118

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels			427		427		427		427		427		427		427												
	Location ID	Sample ID	Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater	B-427-009		S-092910-RW-003(4-6)		S-092910-RW-003(6-8)		S-022411-WK-046		S-022411-WK-047		S-022411-WK-048		DUP-022411-WK-051		S-022411-WK-049		S-022411-WK-050		S-022411-WK-052		S-022411-WK-053		S-022411-WK-054			
					9/29/2010		9/29/2010		9/29/2010		2/24/2011		2/24/2011		2/24/2011		2/24/2011		2/24/2011		2/24/2011		2/24/2011		2/24/2011		2/24/2011		2/24/2011	
					2-4		4-6		6-8		0-0.5		0.5-2		2-4		2-4		4-6		6-8		0-0.5		0.5-2		2-4		2-4	
Depth Range	Depth Interval			Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface			
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit																												
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2	MCL	18	C	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2	MCL	18	C	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2	MCL	18	C	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2	MCL	18	C	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	1.2	0.76	< 0.042	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2	MCL	18	C	0.16	0.23	0.021 J	2.1 J	0.25	< 0.41	< 0.2	0.028 J	< 0.04	3	0.95	0.15												
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2	MCL	18	C	< 0.035	< 0.04	< 0.041	< 0.21	< 0.04	< 0.41	< 0.2	< 0.042	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04	< 0.41	< 0.4	< 0.04
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2	MCL	18	C	0.034 J	0.03 J	< 0.041	0.62 J	0.036 J	< 0.41	< 0.2	< 0.042	< 0.04	0.71	0.22 J	0.024 J												
Total PCBs	1336-36-3	mg/kg	6.2	MCL	18	C	0.194	0.26	0.021	2.72	0.286	1.2	0.76	0.028	< 0.04	3.71	1.17	0.174												

Notes:

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels			427		427		427		427		427		427	
	Location ID	Sample ID	Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater		B-427-012	B-427-012	B-427-012	B-427-013	B-427-013	B-427-013	B-427-014	B-427-014	B-427-014	B-427-014	B-427-015	
						S-022311-WK-007	S-022311-WK-008	S-022311-WK-009	S-022311-WK-023	S-022311-WK-024	S-022311-WK-025	S-022311-WK-001	S-022311-WK-002	S-022311-WK-003	DUP-022311-WK-005	S-022411-WK-055	
	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date	Sample Date
Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range	Depth Range
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit															
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2 MCL	18 C		< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2 MCL	18 C		< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2 MCL	18 C		< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2 MCL	18 C		< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2 MCL	18 C		<b>6.9</b>	<b>6.9</b>	0.36	<b>12</b>	<b>17 J</b>	0.77	1.2	3.6	0.29 J	0.093 J	4.3	
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2 MCL	18 C		< 0.81	< 0.79	< 0.04	< 0.76	< 1.9 J	< 0.21	< 0.22	< 0.4	< 0.042	< 0.045	< 0.83	
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2 MCL	18 C		1.6	1.4	0.048	2.2	3 J	0.11 J	0.27	0.48 J	0.044	< 0.045	0.84	
Total PCBs	1336-36-3	mg/kg	6.2 MCL	18 C		<b>8.5</b>	<b>8.3</b>	0.408	<b>14.2</b>	<b>20</b>	0.88	1.47	4.08	0.334	0.093	5.14	

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels			427	427	427	427	427	427	427	427	428	428	428
	Location ID		Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater		B-427-015	B-427-015	B-427-015	B-427-016	B-427-016	B-427-016	B-427-016	B-427-016	B-428-002	B-428-002	B-428-002
	Sample ID					S-022411-WK-056	S-022411-WK-057	S-022411-WK-058	S-022311-WK-010	S-022311-WK-011	DUP-022311-WK-014	S-022311-WK-012	S-022311-WK-013	S-092910-RW-004(0-2)	S-092910-RW-004(2-4)	DUP-092910-RW-004FD
	Sample Date		2/24/2011	2/24/2011	2/24/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	2/23/2011	9/29/2010	9/29/2010	9/29/2010		
Depth Range		0.5-2	2-4	4-6	0-0.5	0.5-2	0.5-2	0.5-2	0.5-2	0.5-2	2-4	4-6	0-2	2-4	2-4	
Depth Interval		Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit														
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2 MCL	18 C	C	< 0.8	< 0.043	< 0.042	< 0.2	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2 MCL	18 C	C	< 0.8	< 0.043	< 0.042	< 0.2	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2 MCL	18 C	C	< 0.8	< 0.043	< 0.042	< 0.2	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2 MCL	18 C	C	< 0.8	< 0.043	< 0.042	< 0.2	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2 MCL	18 C	C	<b>7.6</b>	0.095	< 0.042	0.96	0.31 J	1 J	< 0.042	0.041 J	1.6 J	0.24	0.15
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2 MCL	18 C	C	< 0.8	< 0.043	< 0.042	< 0.2	< 0.041	< 0.2	< 0.042	< 0.042	< 0.75 J	< 0.039	< 0.041
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2 MCL	18 C	C	1.8	< 0.043	< 0.042	0.22	0.066	< 0.2	< 0.042	< 0.042	0.52 J	0.042	< 0.041
Total PCBs	1336-36-3	mg/kg	6.2 MCL	18 C	C	<b>9.4</b>	0.095	< 0.042	1.18	0.376	1	< 0.042	0.041	2.12	0.282	0.15

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels				428	428	428	428	428	428	428	428	428	428	428	428
	Location ID	Sample ID	Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater	Sample Date	Depth Range	B-428-002	B-428-002	B-428-002	B-428-002	B-428-002	B-428-002	B-428-003	B-428-003	B-428-003	B-428-003	B-428-005	B-428-005
							S-092910-RW-004(4-6)	S-092910-RW-004(6-8)	S-092910-RW-004(8-10)	S-092910-RW-004(10-12)	S-092910-RW-004(12-14)	S-092910-RW-004(14-16)	S-092910-RW-007(0-2)	S-092910-RW-007(2-4)	S-092910-RW-007(4-6)	S-092910-RW-007(6-8)	S-093010-RW-015(0-2)	S-093010-RW-015(2-4)
							9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/30/2010	9/30/2010
Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2 MCL	18 C		< 3.6	< 0.19	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038	< 0.041	
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2 MCL	18 C		< 3.6	< 0.19	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038	< 0.041	
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2 MCL	18 C		< 3.6	< 0.19	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038	< 0.041	
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2 MCL	18 C		<b>48</b>	1.3	< 0.043	0.11	0.056	0.073	< 0.4	0.3	< 0.039	< 0.041	< 0.038	< 0.041	
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2 MCL	18 C		< 3.6	< 0.19	< 0.043	< 0.043	< 0.04	< 0.039	1.2	< 0.2	< 0.039	< 0.041	< 0.038	< 0.041	
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2 MCL	18 C		< 3.6	0.18 J	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038	< 0.041	
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2 MCL	18 C		5.4	< 0.19	< 0.043	< 0.043	< 0.04	< 0.039	< 0.4	< 0.2	< 0.039	< 0.041	< 0.038	< 0.041	
Total PCBs	1336-36-3	mg/kg	6.2 MCL	18 C		<b>53.4</b>	1.48	< 0.043	0.11	0.056	0.073	1.2	0.3	< 0.039	< 0.041	< 0.038	< 0.041	

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels		428		428		428		428		428		428		428	
	Location ID		Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater	B-428-005	B-428-005	B-428-006	B-428-006	B-428-006	B-428-006	B-428-006	B-428-006	B-428-006	B-428-006	B-428-007	B-428-007	B-428-007	
	Sample ID				S-093010-RW-015(4-6)	S-093010-RW-015(6-8)	S-022411-WK-039	S-022411-WK-040	DUP-022411-WK-045	S-022411-WK-041	S-022411-WK-042	S-022411-WK-043	S-022411-WK-044	S-022311-WK-016	S-022311-WK-017	DUP-022311-WK-021		
	Sample Date				9/30/2010	9/30/2010	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/24/2011	2/23/2011	2/23/2011	2/23/2011		
Depth Range		4-6	6-8	0-0.5	0.5-2	0.5-2	0.5-2	2-4	4-6	6-8	8-10	0-0.5	0.5-2	0.5-2				
Depth Interval		Subsurface		Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface		
PCBs (polychlorinated biphenyls)	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J	< 0.043	< 0.22	< 0.41	< 0.2
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J	< 0.043	< 0.22	< 0.41	< 0.2
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J	< 0.043	< 0.22	< 0.41	< 0.2
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J	< 0.043	< 0.22	< 0.41	< 0.2
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	0.72	0.14 J	0.31 J	<b>23 J</b>	<b>39 J</b>	<b>18 J</b>	< 0.043	1.1	2.1	2
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	< 0.21	< 0.039	< 0.039	< 3.9 J	< 7.7 J	< 4.1 J	< 0.043	< 0.22	< 0.41	< 0.2
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	0.18 J	0.021 J	0.052	2.6 J	< 7.7 J	< 4.1 J	0.031 J	0.25	0.26 J	0.21
Total PCBs	1336-36-3	mg/kg	6.2	MCL	18	C	< 0.038	< 0.04	0.9	0.161	0.362	<b>25.6</b>	<b>39</b>	<b>18</b>	0.531	1.35	2.36	2.21

Notes:

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 1.3 Comparison of Soil Column Analytical Data to Residential and Industrial Soil Migration to Groundwater Screening Levels

Constituents (mg/kg)	Parcel		IDEM Screening Levels			428	428	428	429	429	429	429	429	429	429	429	429	
	Location ID	Sample ID	Residential Soil Migration to Groundwater	Industrial Soil Migration to Groundwater		B-428-007	B-428-007	B-428-007	B-X010Y242	B-X010Y242	B-X010Y242	B-429-001	B-429-001	B-429-001	B-429-001	B-429-001	B-429-001	
						S-022311-WK-018	S-022311-WK-019	S-022311-WK-020	S-012109-DD-1589	S-012109-DD-1590	S-012109-DD-1591	S-092910-RW-005(0-2)	S-092910-RW-005(2-4)	S-092910-RW-005(4-6)	S-092910-RW-005(6-8)	DUP-092910-RW-005FD	S-092910-RW-005(8-10)	
	Sample Date	Depth Range				2/23/2011	2/23/2011	2/23/2011	1/21/2009	1/21/2009	1/21/2009	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	9/29/2010	
Depth Interval					2-4	4-6	6-8	0-2	6-8	9-11	0-2	2-4	4-6	6-8	6-8	6-8	8-10	
						Subsurface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Surface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface	Subsurface
<b>PCBs (polychlorinated biphenyls)</b>	CAS No	Unit																
Aroclor-1016 (PCB-1016)	12674-11-2	mg/kg	6.2	MCL	18	C	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	< 0.045	< 0.34	< 0.17	< 0.2	< 0.39	< 3.9	< 0.041
Aroclor-1221 (PCB-1221)	11104-28-2	mg/kg	6.2	MCL	18	C	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	< 0.045	< 0.34	< 0.17	< 0.2	< 0.39	< 3.9	< 0.041
Aroclor-1232 (PCB-1232)	11141-16-5	mg/kg	6.2	MCL	18	C	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	< 0.045	< 0.34	< 0.17	< 0.2	< 0.39	< 3.9	< 0.041
Aroclor-1242 (PCB-1242)	53469-21-9	mg/kg	6.2	MCL	18	C	<b>11 J</b>	2.9	0.054	< 0.76	< 0.83	< 0.045	< 0.34	< 0.17	< 0.2	< 0.39	< 3.9	0.028 J
Aroclor-1248 (PCB-1248)	12672-29-6	mg/kg	6.2	MCL	18	C	< 2 J	< 0.4	< 0.041	3.9	<b>6.9</b>	< 0.045	1.8	0.86	1.4	5.4	<b>25</b>	< 0.041
Aroclor-1254 (PCB-1254)	11097-69-1	mg/kg	6.2	MCL	18	C	< 2 J	< 0.4	< 0.041	< 0.76	< 0.83	< 0.045	< 0.34	< 0.17	< 0.2	< 0.39	< 3.9	< 0.041
Aroclor-1260 (PCB-1260)	11096-82-5	mg/kg	6.2	MCL	18	C	1.8 J	0.65	< 0.041	1.1	1.5	< 0.045	< 0.34	0.12 J	0.15 J	0.45	4.6	0.028 J
Total PCBs	1336-36-3	mg/kg	6.2	MCL	18	C	<b>12.8</b>	3.55	0.054	5	<b>8.4</b>	< 0.045	1.8	0.98	1.55	5.85	<b>29.6</b>	0.056

**Notes:**

All values are in milligrams per kilogram (mg/kg)

**Bold exceedances of the Residential Migration to Groundwater Criteria**

**Shade and Bold exceedances of the Industrial Migration to Groundwater Criteria**

C - Screening Level is based on a cancer endpoint

MLC - Screening Level is based on protection of the Federal Maximum Contaminant Level (MLC)

ND - not detected

J - estimated value

Surface soil is defined as 0 to 0.5 feet below ground surface (bgs) (samples collected from 0-2 feet bgs are considered surface soil samples)

Subsurface soil is defined as greater than 0.5 feet bgs

Table 2.1 Occurrence of PCBs in Soil, Madison Street Parcel 427

Constituent	Frequency Detects / Total	Percent Detects	Range of SQLs		Range of Detects		Estimates of the Mean (mg/kg)			Screening Levels		ProUCL EPC (mg/kg)	EPC < Screening Level
			Min - Max (mg/kg)	Min - Max (mg/kg)	Data Distn	Average	UCL	[a]	IDEM RCG (mg/kg)				
<u>Polychlorinated Biphenyls</u>													
All PCBs (Surface & Subsurface)	30 / 62	48%	0.037 - 0.049	0.021 - 16	(ln)	1.5	2.19	<i>95kmt</i>	18	[b]	2.2	Yes	
Surface Soil PCBs	10 / 16	63%	0.037 - 0.042	1.18 - 16	(ln)	3.7	6.253	<i>95pbu</i>	7.4	[c]	6.3	Yes	
Subsurface Soil PCBs	20 / 46	43%	0.037 - 0.049	0.021 - 9.4	(ln)	0.72	1.214	<i>95kmt</i>	18	[b]	1.2	Yes	

[a] UCL Statistics: *95kmt* = 95% UCL based upon Kaplan-Meier (KM) estimates using the Student's t-distribution cutoff value, *95kmc* = 95% UCL based upon KM estimates using the Chebyshev inequality; *95kmb* = 95% UCL based upon KM Bias-Corrected Accelerated (BCA) Bootstrap, *95pbu* = 95% KM (Percentile Bootstrap) UCL

[b] IDEM RCG (2012) Excavation Worker

[c] IDEM RCG (2012) Commercial/Industrial Direct Contact Screening Level

mg/kg: Milligrams per kilogram.

SQLs: Practical sample quantitation limits for the non-detects.

Data Distn: Assumed data distribution: "n" = normal, "ln" = lognormal, "(n)" = indeterminant (normal default), "(ln)" = assumed lognormal.

UCL: The 95 percent one-tailed upper confidence limit on the mean assuming a lognormal distribution (Gilbert 1987).

EPC: Exposure point concentration.

IDEM: Indiana Department of Environmental Management

RCG: IDEM Remediation Closure Guide (2012)

ProUCL: USEPA statistical program that can estimate exposure point concentration (EPC) terms, not-to-exceed values, and background threshold values (BTVs) for data sets with nondetect (ND) and without ND observations.

Table 2.2 Occurrence of PCBs in Soil, Madison Street Parcels 428 and 429

Constituent	Frequency Detects / Total	Percent Detects	Range of SQLs		Range of Detects		Estimates of the			Screening Levels		EPC < Screening Level
			Min - Max (mg/kg)	Min - Max (mg/kg)	Data Distn	Mean (mg/kg)		IDEM RCG (mg/kg)	ProUCL EPC (mg/kg)			
						Average	UCL [a]					
<b>Polychlorinated Biphenyls</b>												
All PCBs (Surface & Subsurface)	47 / 76	62%	0.034 - 0.045	0.022 - 18	(ln)	1.8	2.564	<sup>95kmb</sup>	18	[b]	2.6	Yes
Surface Soil PCBs	11 / 14	79%	0.034 - 0.038	0.022 - 5	(ln)	1.3	2.836	<sup>95kmc</sup>	7.4	[c]	2.8	Yes
Subsurface Soil PCBs	36 / 62	58%	0.037 - 0.045	0.034 - 18	(ln)	2	2.874	<sup>95kmb</sup>	18	[b]	2.9	Yes

[a] UCL Statistics: <sup>95kmc</sup> = 95% UCL based upon Kaplan-Meier (KM) estimates using the Chebyshev inequality; <sup>95kmb</sup> = 95% UCL based upon KM Bias-Corrected Accelerated (BCA) Bootstrap

[b] IDEM RCG (2012) Excavation Worker

[c] IDEM RCG (2012) Commercial/Industrial Direct Contact Screening Level

mg/kg: Milligrams per kilogram.

SQLs: Practical sample quantitation limits for the non-detects.

Data Distn: Assumed data distribution; "n" = normal, "ln" = lognormal, "(n)" = indeterminant (normal default), "(ln)" = assumed lognormal.

UCL: The 95 percent one-tailed upper confidence limit on the mean assuming a lognormal distribution (Gilbert 1987).

EPC: Exposure point concentration.

IDEM: Indiana Department of Environmental Management

RCG: IDEM Remediation Closure Guide (2012)

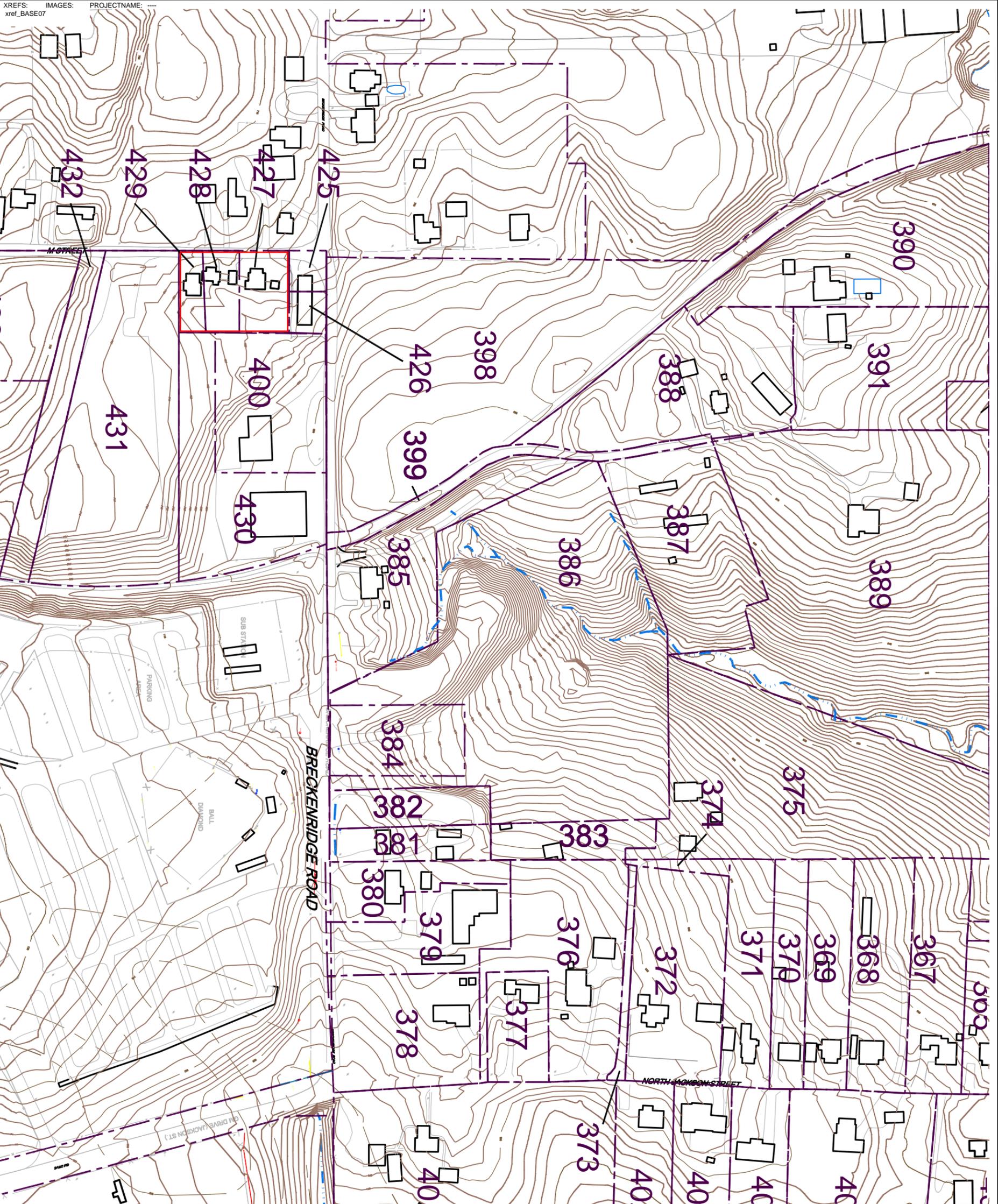
USEPA statistical program that can estimate exposure point concentration (EPC) terms, not-to-exceed values, and background threshold values (BTVs) for data sets with nondetect (ND) and without ND ProUCL: observations.

Table 3 Soil Excavation Areas Summary Volumes

Excavation Area	Area Footprint (ft <sup>2</sup> )	Overburden Interval (ft bgs)	Overburden Volume (yd <sup>3</sup> )*	Non-Haz Excavation Interval (ft bgs)	Non-Haz Disposal Volume (yd <sup>3</sup> )*	TSCA Excavation Interval (ft bgs)	TSCA Disposal Volume (yd <sup>3</sup> )*
A	550	0-2	53	NA	NA	2-4	53
B	1575	NA	0	0-2	152	NA	NA
C	815	0-4	157	NA	NA	4-6	78
D	732	0-2	70	2-4	70	4-6	70
E	514	0-2	49	2-4	49	NA	NA
F	155	0-6	45	6-8	16	NA	NA
<b>TOTAL</b>			<b>374</b>		<b>287</b>		<b>201</b>

NA Not applicable

\* Fluff factor of 1.3 calculated for soil volumes



- LEGEND**
- EXISTING BUILDINGS
  - FENCE LINE
  - RAILROAD TRACKS
  - DIRT ROADS
  - ROADS / PAVED AREAS
  - APPROXIMATE SURFACE WATER LOCATION



**NOTE:**

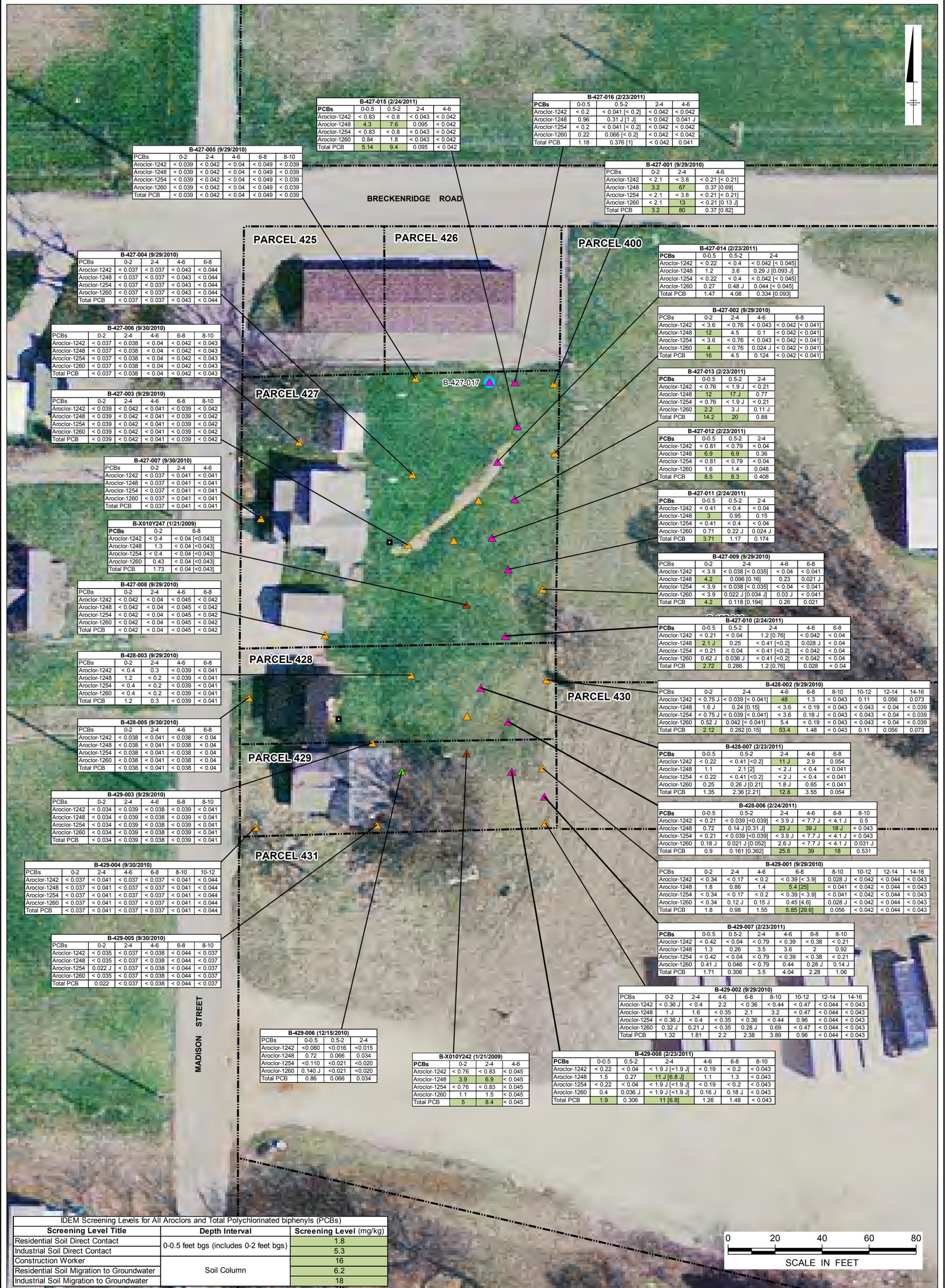
- 1) GM PROPERTY BOUNDARY SURVEY BY BLEDSOE RIGGERT GUERRETTAZ RECEIVED OCTOBER 2007. ADJACENT PROPERTY BOUNDARY LOCATIONS APPROXIMATED FROM THE LAWRENCE COUNTY SURVEY PLANS. ADJOINING PROPERTY LINES MAY NOT ACCURATELY REPRESENT THE TRUE PROPERTY BOUNDARIES
- 2) BASE MAP COMPLETED BY AIR-LAND SURVEYS, FLINT MI, APRIL 200 (CONESTOGA-ROVER & ASSOCIATES, 2007).



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**MADISON STREET PARCELS**

**Site Map**





AERIAL SOURCE: High Resolution Ortho, Lawrence County Mosaic (NRCS 2005).  
 PROJECTION: NAD83 State Plane Indiana West Feet

**LEGEND**

- Parcel Boundary
- Septic Tank
- Manhole
- ▲ Historical Soil Boring (January 2009)
- ▲ Direct Push Soil Boring (September 2010)
- ▲ Direct Push Soil Boring (February 2011)
- ▲ Direct Push Soil Boring (February 2011 - not analyzed)

**NOTES:**

- 1) Parcel boundaries along R.O.W.'s are estimated.
- 2) Sample dates are provided after the sample location.
- 3) All concentrations were reported in milligrams per kilogram (mg/kg).
- 4) Screening levels are as shown on the IDEM Screening Levels for all Aroclors and Total Polychlorinated biphenyls (PCBs).
- 5) Exceedances of screening levels are shaded.
- 6) Only Aroclors that were detected in one or more sample are presented in the databoxes.
- 7) [ ] indicates results presented were from a duplicate sample.
- 8) Depth intervals are in feet below ground surface (ft bgs).

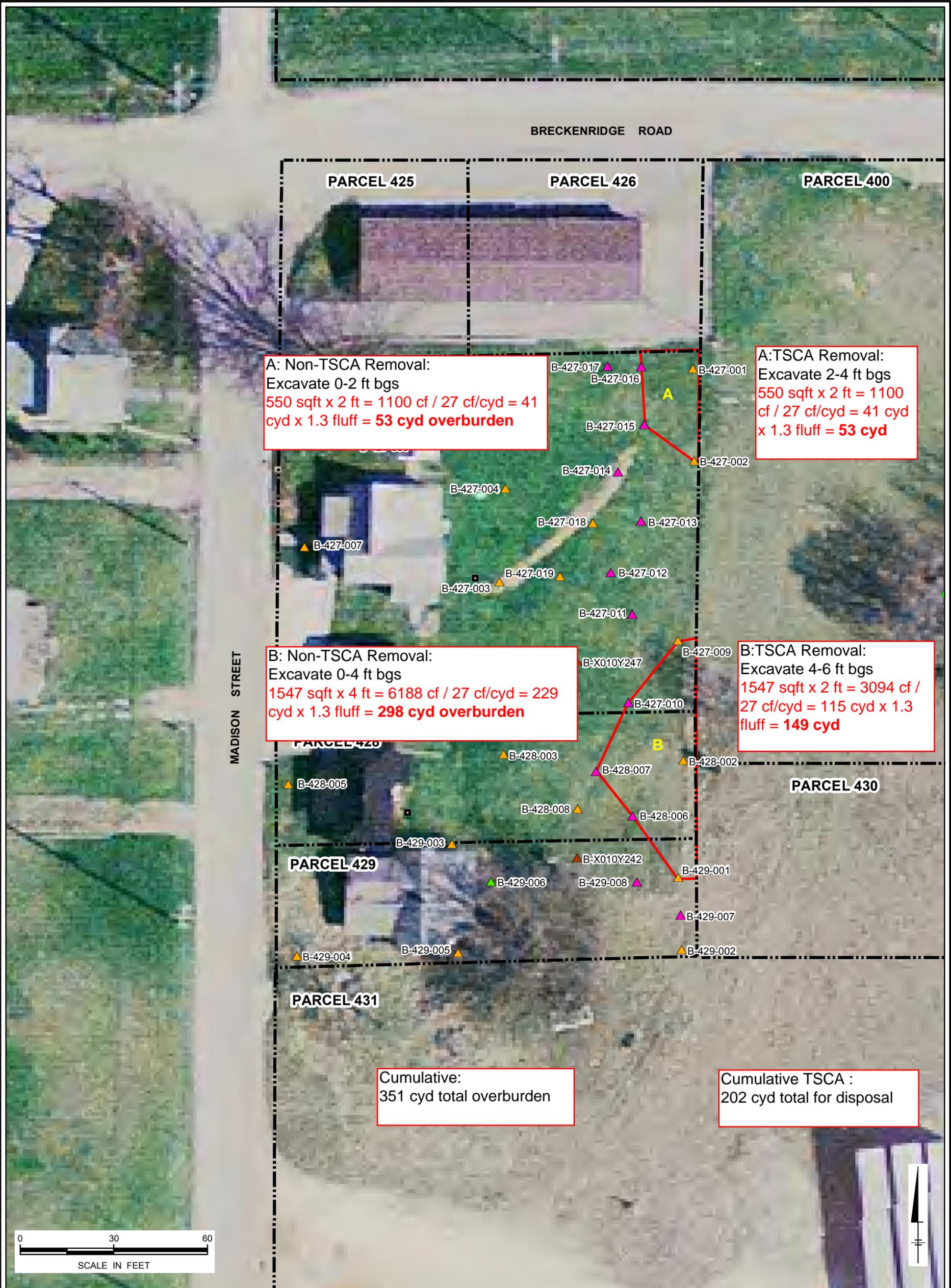
RACER TRUST  
 BEDFORD, INDIANA  
**MADISON STREET PARCELS**

**Summary of PCBs Detected in Soil**



FIGURE

**2**



AERIAL SOURCE: High Resolution Ortho,  
 Lawrence County Mosaic (NRCS 2005).  
 PROJECTION: NAD83 State Plane Indiana West Feet

- LEGEND**
- Parcel Boundary
  - ▭ Excavation Extent
  - Septic Tank
  - Manhole
  - ▲ Historical Soil Boring (January 2009)
  - ▲ Direct Push Soil Boring (September 2010)
  - ▲ Direct Push Soil Boring (December 2010)
  - ▲ Direct Push Soil Boring (February 2011)

**NOTES:**  
 1) Parcel boundaries along R.O.W.'s are estimated.  
 2) B-X010Y242 and B-X010Y247 were sampled by Conestoga Rovers and Associates. Remaining locations were sampled by ARCADIS.

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**MADISON STREET PARCELS**

**Proposed Excavation Extents**

**ARCADIS**

FIGURE  
**3**